

UNITED STATES ENVIRONMENTAL AGENCY
In Reply Refer Region III - 6th & Walnut Sts.
To 3EN11 Philadelphia, Pa. 19106

572

SUBJECT: Meeting With DER - Asbestos Waste Piles

DATE: APR 20 1976

FROM: Abraham Ferdas 3EN11 *Ab Ferdas*
Air Compliance Branch

TO: Leland Marshall 3EN11
Chief, Pa., W.Va. & Del. Sources Section

On April 14, 1976, a meeting was held between EPA and Pennsylvania DER-Region I in their Norristown offices. The reason for the meeting was to discuss the efforts of both agencies on dealing with the asbestos waste piles in Ambler, Pennsylvania.

Participants:

EPA

Walter F. Lee - Industrial Permits Branch
Jon H. Hundertmark - Industrial Permits Branch
Abraham Ferdas - Air Compliance Branch

DER-Region I

Betty McCoubrey - Office of Enforcement
C.T. Beechwood - Regional Sanitary Engineer
Wayne L. Lynn - Regional Solid Waste Director
Rao Kona - Regional Air Engineer
Leon T. Gonsbor - Regional Industrial Hygienist

This memo will be limited to only the discussion as it concerns air regulations. There were considerable discussions on the issue of asbestos in drinking water and the ongoing sampling program (see W. Lee).

Also, discussions on the NPDES permits (see J. Hundertmark).

The meeting was divided into discussions of the individual companies involved.

Nicolet

At the present time, Nicolet is under a DER order calling for solidification of the piles and discontinuation of dumping. Nicolet has appealed the order. At the same time, DER stated that reasonable progress is being made with Nicolet. The appeal was mainly for the purpose of protecting Nicolet's rights and to object to the short time schedules given in the order. Nicolet has agreed to stop dumping any additional waste by July, 1976.

AR000601

will be done by installing recycling equipment. They have also agreed to undertake a long-term program to stabilize the piles by vegetation or other means. Nicolet has a contract with the University of Pennsylvania to study and give recommendation on solutions for the problem. DER feels that two years is not a reasonable length of time to achieve a final solution to the problem. Therefore, they requested from us not to address the final stabilization of the piles as part of NESHA's enforcement.

I summarized the finding of my inspection of Nicolet on April 8, 1976. This included my findings that there were no warning signs posted and that the fence did not include the whole perimeter of the piles. Fencing was present on the southwest side of the piles adjacent to the nature preserve and the Wissahickon Creek. Also, fencing was not present on the area facing the Reading Railroad tracks. Also, I mentioned Nicolet's request for a Waiver to install recycling equipment extending to September 1, 1977.

DER stated that there are problems with fencing the entire perimeter of the piles due to flood plains and they are also not needed in some areas due to natural barriers; but, agreed with me that additional fencing is required.

We agreed that EPA will send a letter to Mr. Gonshor asking him to evaluate the additional fencing required. Also, request material available on the agreed schedule to recycle the waste extending to July, 1976. I stated that we would like their input on the above points due to their greater knowledge of the area and their ability to evaluate the problem using an intermediate approach.

DER is also planning to run with contractual help a long time air sampling program for asbestos to determine the impact of the inactive piles. That contract will be awarded soon.

I received from Mr. Gonshor, a copy of the Pennsylvania Department Health study on possible health hazards of the asbestos piles dated August 1975. I think there is a need to review carefully this study before we dismiss any possible 303 action. At this time, it is not clear who will do the review, but the Office of Toxic Substances has shown an interest since if there are any problems with the drinking water.

Certain-teed

Certain-teed is under a consent order with DER to stop dumping on piles and fence. The fence along the pile is complete except for a section at the southwest side of the pile which faces the nature preserve. Signs are posted along the fence. The recycling system is completed and the company has stopped dumping asbestos slurry from the waste water treatment plant. The company continues to dump rejected asbestos pipe in the pile.

DER expects to be successful in stopping them from dumping the pile in July, 1976. It was not clear to me how, but it seems they believe this.